

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

VERIZON COMMUNICATIONS, INC.

ET AL.,

*Defendants.*

Civil Action No. 2:23-cv-00352-JRG-RSP

**JURY DEMANDED**

**JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER**

Pursuant to the Court’s Order setting a deadline to file a proposed Protective Order (D.I. 11) and extensions thereto (D.I. 35, 42), Plaintiff Headwater Research, LLC (“Headwater”) and Defendants Cellco Partnership, d/b/a Verizon Wireless and Verizon Corporate Services Group Inc. (collectively, “Verizon” or “Defendants”),<sup>1</sup> (collectively, the “Parties”) hereby jointly request that the Court enter the proposed Protective Order, attached hereto as Exhibit A.

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<sup>1</sup> Verizon contends that Verizon Communications Inc. (“VCI”) is not a proper party to this case, and therefore VCI is not included as a moving party pending a resolution for dismissal of VCI.

Dated: October 31, 2023

*/s/ Katherine Q. Dominguez*

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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 31st day of October 2023, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster

Marc Fenster

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Marc Fenster  
Marc Fenster